UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

July 1, 1999

Ms. Carol Hathaway
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401

RE: Comments on the Draft Final Proposed Plan for the Central Facility Area, Operable Unit 4-13A, at INEEL

Dear Carol:

Enclosed are our comments on the Draft Final Proposed Plan for Operable 4-13A. After you have reviewed these comments, please contact me to discuss and resolve any outstanding issues before completing the Final Proposed Plan.

Sincerely,

Keith A. Rose
INEEL WAG Manager

Enclosure
cc: Clyde Cody, IDEQ

EPA COMMENTS ON THE DRAFT FINAL
WAG 4-13A PROPOSED PLAN

Reviewer: Keith Rose

1) Page 5, last paragraph. Should read, " The objective of the comprehensive remedial investigation (OU4-13B) is to determine the extent of nitrate contamination in the groundwater, determine the fate of this nitrate, and to identify the source of this nitrate."

2) Page 6, 2nd sidebar. Eliminate the first sentence. The risk assessment does predict potential future risk for certain future uses based on various exposure assumptions.

3) Page 6, last paragraph. In the second sentence eliminate "within or" and "or if lead concentrations are greater than 400 mg/kg."

4) Page 9, 1st paragraph. The first sentence should read, "Preliminary remediation goals are the quantitative cleanup levels which will achieve the above remedial action objectives." Eliminate the second sentence of this paragraph.

5) Page 11, Table 3. Since mercury has both a human health and ecological risk at this site, identify the PRGs for both types of receptors. The PRG for ecological receptors should be identified as 10X background in a footnote.

6) Page 14, last sentence. The end of this sentence should read, ". . . because it would reduce contaminant mobility through stabilization and would achieve a higher long-term effectiveness by placing contaminated soil in a monitored, engineered disposal facility."

7) Page 16, Table 5. Mercury should be eliminated as a COC in this table since it does not exceed the PRG for ecological receptors (0.74 mg/kg).

8) Page 17, Alternative 2. If this alternative does not include institutional controls for 189 years, it does not meet the threshold criteria for protection of human health and should not be presented as a viable alternative in the Proposed Plan.

9) Page 18, sidebar. The purpose of this cost comparison should be to compare the cost of achieving a future residential vs. future industrial cleanup level for Alternative 3, because Alternative 3 would have the most significant cost savings using an industrial scenario.

10) Page 28. Identify the locations where the public meetings will be held in each city.

Reviewer: Judi Schwarz

1) Page 7, Table 2. Explain what is meant by "threshold level".

2) Page 11, 1st paragraph. The presence of metals does not require disposal in accordance with RCRA unless the metals fail TCLP and are a characteristic waste.

3) Page 12, 3rd sidebar. Explain that for the residential scenario it was assumed that cleanup goals would also protect ecological receptors but for the industrial scenario it was assumed that protection of ecological receptors would not be achieved.

4) Page 14, last paragraph. Would Alternative 3b have a more significant impact on controlling the source of nitrates to the groundwater than Alternative 4? If so, this would be another justification for selection of 3b as the contingent remedy.

5) Page 20. ARAR sidebar. Eliminate the reference to delisting requirements since there are no delisting requirements for soil contaminated with characteristic waste.

6) Page 22, 2nd paragraph. Explain where soils would be disposed under Alternative 3b.

Reviewer: Tod Gold

My previous comment on the proposed plan was that it was not clear how the preferred alternative for the CFA-04 disposal pond would comply with RCRA. My comment has not been answered satisfactorily.

The problem is that the preferred alternative is excavation, treatment and disposal of mercury-contaminated soil. The treatment method is stabilization with Portland cement. INEEL has not explained how this treatment method complies with the RCRA ARAR, 40 CFR 268.49.

The LDR treatment standard requires contaminated soils to be treated to reduce concentrations of hazardous constituents by 90 percent or meet hazardous constituent concentrations that are ten times the universal treatment standards, whichever is greater. INEEL needs to explain how stabilization with Portland cement complies with this requirement.